REMARKS

Claims 1-4, 6-10, 14, 18-20, 22-26, 30, 34 and 35 are pending, claims 1 and 18 having been amended as described herein. Reconsideration is respectfully requested.

Initially, applicants remind the Examiner that they submitted an Information Disclosure Statement (IDS) on July 25, 2003, listing documents that were cited in counterpart foreign applications. The Examiner has considered one such document (JP 6-23993) as indicated in the rejection discussed below. However, applicants respectfully request that all of the listed documents be considered and that a copy of the Form PTO-1449 be initialed and returned indicating that such documents have been considered.

Claims 1-3, 6, 18-20 and 22 stand rejected under 35 U.S.C. § 102(b) based on JP 4-338550 (JP '550). This rejection is respectfully traversed. Applicants' claimed methods, as set forth in claims 1 and 18, recite that, after the head base is completely stripped off from the green sheet, the entire process of forming one or more nozzle ports on the head base is performed. Applicants' have amended each of these claims to emphasize this point, namely, that the forming of the nozzle port on the head base begins and ends after stripping off said head base from the green sheet. This specific sequence of steps is supported in the as-filed application at, for example, p. 14, line 8 – p. 15, line 20 of the specification and corresponding Fig. 9.

The Examiner argues that, while the process of forming the nozzle ports may begin before the head base is stripped from the green sheet in JP '550, it is impossible to completely form the nozzle ports until after the head base is stripped from the green sheet, because neither the nozzle ports nor the head base can be used in any ink-jet operation until after this separation occurs. This argument fails to properly distinguish between "formed" and "ready for use". When a completed product is delivered with a cover or packaging to protect it, the receiver would not consider the product not completely formed. Rather, he would simply understand that it is not quite ready for the use; the cover or

packaging must be removed first. Fig. 2(f) of JP '550 shows that the nozzle ports of its device are formed before the electroforming film is peeled from the substrate. That the ports and the device itself are not ready for use until the green sheet is removed does not change that fact.

By entirely forming the nozzle port(s) after the head base is completely stripped off from the green sheet, rather than before or during the stripping process, applicants' claimed methods reduce the likelihood of the nozzle deforming in the process. JP '550 does not disclose nor teach this aspect of applicants' claimed invention nor the advantage that flows from it.

This distinction is also applicable to JP 6-23993 (JP '993), which has been used to reject claims 1, 6-8, 10, 14, 18, 22-24, 26, 30, 34 and 35 under 35 U.S.C. § 102(b). In JP '993 nozzle formation is started when the film 22 is adhered to the mold 21, before the hardened resin 24 is removed from the mold 21. See JP '993, Fig. 8. Completion of the nozzles 26 then occurs, not after the removal of the hardened resin 24 from the mold 21, but while the hardened resin 24 is being washed from the mold 21. See JP '993 translation, paragraph [0020].

The remaining references, *Trueba*, *Moynihan* and *Sachdev*, that have been respectively applied in combination with JP '550 to reject claims 4, 7 and 23; claims 8, 9, 24 and 25; and claims 10 and 26, do not offset the fundamental defect of JP '550. Thus, each of these dependent claims, as well as each of the other pending dependent claims, is patentable for at least the same reason as its independent claim.

In view of the foregoing amendments and remarks, it is respectfully submitted that all pending claims of this application are patentably distinguishable over the prior art of record. Should the Examiner believe that any issue(s) remain outstanding, he is respectfully requested to call Applicants' undersigned attorney at (408) 952-6126 in an effort to resolve such issue(s) and advance the case to grant.

Respectfully submitted,

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